



# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



FEB 24 2016

Roland I Trevino  
Pacific Gas & Electric Company  
PO Box 7640  
San Francisco, CA 94120

**RE: Final – Authority to Construct/Certificate of Conformity (Minor Mod)**  
**Facility Number: N-608**  
**Project Number: N-1153488**

Dear Mr. Trevino:

The Air Pollution Control Officer has issued the Authority to Construct permit to Pacific Gas & Electric Company for authorization of a new tank and loadout operation, at the McDonald Island Compressor Station, Holt, California.

Enclosed is the Authority to Construct permit. The District's analysis of the proposal was sent to US EPA Region IX on January 25, 2016. No comments were received following the District's preliminary decision on this project.

Prior to operating with the modifications authorized by the Authority to Construct, you must submit an application to modify the Title V permit as an administrative amendment in accordance with District Rule 2520, Section 11.5. Application forms have been enclosed for your use. These forms may also be found on the District's website at [www.valleyair.org](http://www.valleyair.org).

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,

Arnaud Marjollet  
Director of Permit Services

AM:rue

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin  
Executive Director/Air Pollution Control Officer

Northern Region  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061  
[www.valleyair.org](http://www.valleyair.org)

Southern Region  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585  
[www.healthyairliving.com](http://www.healthyairliving.com)



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** N-608-33-0

**ISSUANCE DATE:** 02/23/2016

**LEGAL OWNER OR OPERATOR:** PACIFIC GAS & ELECTRIC CO.  
**MAILING ADDRESS:** ATTN: AIR QUALITY PERMITS

P O BOX 7640  
SAN FRANCISCO, CA 94120

**LOCATION:** MCDONALD ISLAND COMPRESSOR STATION  
HOLT, CA 95234

**EQUIPMENT DESCRIPTION:**

PIPELINE LIQUID TRANSFER, STORAGE, AND LOADOUT OPERATION CONSISTING OF A 2,000 GALLON CONVAULT ABOVEGROUND FIXED ROOF STORAGE TANK (D-1A) EQUIPPED WITH A PRESSURE VACUUM RELIEF VALVE, AND TANKER TRUCK LOADOUT EQUIPMENT

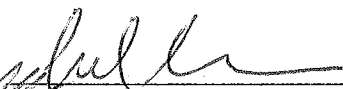
## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. Tank breather vent setting shall be -0.31 in H<sub>2</sub>O vacuum and +0.90 in H<sub>2</sub>O. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The Reid vapor pressure (RVP) of the organic stored in the tank shall not exceed 3.3 psia. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
6. The organic liquid transfer into the tank shall not exceed any of the following limits: 900 gallons/day and 16,000 gallons/year (12-month rolling basis). [District Rule 2201] Federally Enforceable Through Title V Permit
7. VOC emissions from transferring and storage of organic liquid in the tank shall not any of the following limits: 1.8 lb/day and 25 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO



Arnaud Marjollet, Director of Permit Services

N-608-33-0 Feb 23 2016 4:15PM - EDGEHILL Joint Inspection NOT Required

8. The owner or operator shall determine TVP within 60 days of initial startup and at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in the tank. The records of TVP testing shall be submitted within 45 days after the date of testing. The records shall include the tank identification number, permit number, type of stored organic liquid, TVP of the stored organic liquid, test methods used, and a copy of the test results. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
9. TVP shall be determined at actual storage temperature of the organic liquid in the tank. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. TVP of the organic liquid shall be determined by measuring the RVP using ASTM D 323-94 (Test Method for Vapor Pressure for Petroleum Products), and converting the RVP to TVP at the tank's maximum organic liquid storage temperature. The conversion of RVP to TVP shall be done in accordance with the procedures in Appendix B. Appendix B is an excerpt from the oil and gas section of "ARB Technical Guidance Document to the Criteria and Guidelines Regulation for AB 2588", dated August 1989. Should the permittee want to use different methodology, then that methodology should be first approved by the District and or the EPA. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
11. The pressure-vacuum relief valve shall be set to within 10 percent of the maximum allowable working pressure of the tank. The pressure-vacuum relief valve shall be permanently labeled with the operating pressure settings. The pressure-vacuum relief valve shall be properly installed and maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve set pressure. [District Rule 4623] Federally Enforceable Through Title V Permit
12. VOC emissions from tanker truck loading operation shall not exceed 1.0 lb/1,000 gallons of pipeline condensate liquid loaded. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The organic liquid loading into tanker truck(s) shall not exceed any of the following limits: 2,000 gallons/day and 16,000 gallons/yr (12-month rolling basis). [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit
14. The organic liquid drainage from disconnections associated with the tanker truck loadout equipment shall not exceed 10 mL per disconnect. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The total number of disconnects shall not exceed any of the following limits: 3 disconnects/day and 24 disconnects/year (12-month rolling basis). [District Rule 2201] Federally Enforceable Through Title V Permit
16. The operator shall determine an average organic liquid drainage for three consecutive disconnects to demonstrate compliance with the permitted organic liquid drainage limit of 10 mL per disconnect. The drainage shall be determined within 60 days of initial startup of the tanker truck transfer operation and the associated records shall be submitted within 45 days after the testing. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Fugitive VOC emissions from components (i.e., valves and connectors located within 60 feet of piping to the D-1A tank used to route the organic liquid into the tank) shall not exceed any of the following limits: 3.3 lb/day and 1,175 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Fugitive VOC emissions shall be calculated using the EPA "Protocol for Equipment Leak Emissions Estimates (EPA-453/R-95-017 (November 1995), Table 2-1, Synthetic Organic Chemical Manufacturing Industry (SOCMI) Average Emission Factors. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Except as otherwise provided in this permit, all piping, valves, and fittings under this permit shall be constructed and maintained in a leak-free condition. Leak free condition is defined as a condition without a gas leak or a liquid leak. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
20. A leak-free condition is a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument that is calibrated with methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. A gas leak or a liquid leak is a violation of this permit and Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

21. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
22. If any of the tank components are found to be leaking, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
23. Upon detection of any leaking components (having a gas leak >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) operator shall: (a) eliminate or minimize the leak within 8 hours after detection, (b) if the leak can not be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices and eliminate the leak within 48 hours after detection. In no event shall the total time to minimize and eliminate the leak exceed 56 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
24. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of the District Rule 4623. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of SJVUAPCD Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
25. If a component type is found to leak during an annual inspection, then conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If a component type is found to have no leak after four consecutive quarterly inspections, then revert to annual inspections. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
26. Any component affixed to the tank or within 5 feet of the tank that is found to be leaking on two consecutive annual inspections is in violation of SJVUAPCD Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
27. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020] Federally Enforceable Through Title V Permit
28. Permittee shall comply with all applicable Tank Interior Cleaning Program requirements specified in Table 3 of Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
29. All components greater than 5 feet from the tank and within 60 ft of the D-1A tank equipment that are found leaking shall be tagged and repaired or replaced within 72 hours of detection. The repaired or replaced equipment must be re-inspected. [District Rule 2201] Federally Enforceable Through Title V Permit
30. For the components covered under this permit, the owner or operator shall keep records of the type of component, number of components, emission factors, total daily (lb/day) and annual VOC emissions (lb/year). [District Rule 2201] Federally Enforceable Through Title V Permit
31. For each component inspected, the owner or operator shall keep records of the date, name of component, its location, measured ppmv value, the name of the operator and the company conducting the leak inspection. [District Rule 2201] Federally Enforceable Through Title V Permit
32. The owner or operator shall keep records of the date, name of the organic liquid stored in tank D-1A, organic liquid RVP, TVP and storage temperature when RVP/TPV samples are taken. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
33. The owner or operator shall keep records of: a.) date, b.) amount of organic liquid transferred into the tank D-1A (gallons/day), c.) amount of organic liquid transferred into the tank D-1A (gallons/month), and d.) cumulative total amount of organic liquid transferred into the tank in a consecutive 12-month rolling period. [District Rule 2201] Federally Enforceable Through Title V Permit
34. The owner or operator shall keep records of: a.) date, b.) number of disconnects (disconnects/day), c.) number of disconnects (gallons/month), and d.) cumulative total number of disconnects in a consecutive 12-month rolling period. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

35. The owner or operator shall keep records of: a.) date, b.) amount of organic liquid loaded into a tanker truck (gallons/day), c.) amount of organic liquid loaded into a tanker truck (gallons/month), and d.) cumulative total amount of organic liquid loaded into a tanker truck in a consecutive 12-month rolling period. [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit
36. Operator shall maintain an inspection log containing the following 1) type of component leaking; 2) date and time of leak detection, and method of detection; 3) date and time of leak repair, and emission level of recheck after leak is repaired; 4) method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 1070] Federally Enforceable Through Title V Permit
37. Permittee shall keep in their facility at all times a copy of the letter sent to the APCO requesting participation in the Rule 4623 Fixed Roof Tank Preventive Inspection and Maintenance Program, and Tank Interior Cleaning Program, and maintain the records of annual tank inspections, maintenance, and cleaning to document the participation in the program. [District Rule 4623] Federally Enforceable Through Title V Permit
38. All records shall be retained for a minimum of five years and shall be made available to the District, ARB, or EPA during normal business hours and submitted upon request. [District Rules 2201, 4623 and 4624] Federally Enforceable Through Title V Permit